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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY

Protecting Texas by Reducing and Preventing Pollution

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August 17, 2011

Mr. Gary Miller, Remedial Project Manager
U.S. EPA, Region 6
Superfund Division (6SF-RA)
1445 Ross Avenue, Suite 1200
Dallas, Texas 75202-2733

Re: *Draft Proposed Plan*, dated July 2011
Gulco Marine Maintenance Federal Superfund Site
Freeport, Brazoria County, Texas



640673

Dear Mr. Miller:

The Texas Commission on Environmental Quality (TCEQ) Remediation Division has completed the review of the *Proposed Plan*, dated July 2011 for the Gulco Marine Maintenance Federal Superfund Site. The TCEQ's comments and recommended corrections are presented below:

1. P.7, Under the column heading "Groundwater", second column, 3rd paragraph, last sentence: delete "indicating that the NAPL is not currently mobile at those location".
2. P. 7, Under the column heading "Groundwater", second column, 4th paragraph, last sentence: delete "and the lack of NAPL in the groundwater samples also indicates that the NAPL is not mobile".
3. P.10, Under the column heading "Chemicals of Concern": 1,1-DCE is missing from the COCs list.
4. P. 12, Under the column heading "Ecological Risk Assessments and Summary of Site Risks", 1st paragraph, second line: Replace the "A" with "An" so that it reads "An ERA is defined as a ...".
5. P. 12, Under the column heading "Baseline Ecological Risk Assessment", 1st paragraph, 3rd line: At the end of the first sentence, add "... and with certain aspects of TCEQ's ERA guidance." This is justified as TCEQ's ecological

Mr. Gary Miller
Page 2
August 17, 2011

screening benchmarks and protective concentration levels were used in the screening level ecological risk assessment and the BERA.

If you have any questions, please contact me at (512) 239-6368.

Sincerely,

A handwritten signature in black ink, appearing to read 'Ludmila Voskov', with a stylized, flowing script.

Ludmila Voskov, P.G., Project Manager
Superfund Section
Remediation Division
Texas Commission on Environmental Quality

LV/sr

cc: Chuck Stone, TCEQ, Remediation Division
Larry Champagne, TCEQ, Remediation Division